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*Attorney for Defendant  
Discover Bank*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

DONNA M. FLOWERS

CASE NO. 2:20-cv-02152-RFB-VCF

Plaintiff,

**STIPULATION TO EXTEND THE  
DISCOVERY AND CASE  
MANAGEMENT DEADLINES BY 45  
DAYS**

V.

DISCOVER BANK

## Defendant.

**(Third Request)**

**BALLARD SPAHR LLP**  
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This stipulation is filed pursuant to LR IA 6-1, LR IA 6-2, and Local Rule 26-3.

17 Local Rule 26-3 requires any request to extend a discovery or case management  
18 deadline be received no later than twenty-one (21) days prior to the expiration of the  
19 subject deadline. The parties are not requesting extensions to the case management  
20 deadlines pertaining to amendment of pleadings and designation of experts.

On April 27, 2021, this Honorable Court adopted the parties' initial Stipulated Discover Plan and Scheduling Order, which provided for a discovery deadline of October 12, 2021 [#21]. On August 13, 2021, this Honorable Court approved the parties' Stipulation extending the discovery deadline through January 12, 2022. On November 10, 2021, this Honorable Court approved the parties' Stipulation extending the discovery deadline through March 14, 2022 [#35].

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The parties are discussing settlement and there is a possibility this action can be concluded without further delay. Plaintiff has served initial disclosures and written discovery requests. Defendant has served initial disclosures and intends to serve its responses to Plaintiff's discovery requests upon execution of a mutually agreed-upon protective order.

Accordingly, the parties request adoption of the following deadlines:

1. Last date to complete discovery: April 28, 2022
2. Last date to file dispositive motions: May 27, 2022
3. Last date to file Joint Pretrial Order: June 27, 2022 or thirty (30) days

after receipt of decision deciding a dispositive motion.

This is the third request for an extension and is made in good faith and not for purposes of delay.

Dated this 11<sup>th</sup> of February, 2022.

MITCHELL D. GLINER, ESQ.

By: /s/ Joel E Tasca

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*Attorney for Plaintiff Donna M. Flowers*

## ORDER

## IT IS SO ORDERED:

*Carolee*

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**UNITED STATES MAGISTRATE JUDGE**

2-11-2022

DATED: